



June 19, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard (Docket No. 16-142)

Dear Ms. Dortch:

This letter is to notify you that on June 18, 2019, Lonna Thompson, Executive Vice President, Chief Operating Officer, and General Counsel, of America’s Public Television Stations; and Talia Rosen, Assistant General Counsel and Senior Director of Standards & Practices, of the Public Broadcasting Service (collectively, “PTV”) met telephonically with Martha Heller, Chief, Policy Division, Office of the Media Bureau.

PTV urged the FCC to exempt noncommercial educational licensees from the simulcasting mandate in connection with deployment of the Next Generation broadcast television standard. This exemption is warranted and essential given the unique mission, structure, governance, finances, history, geographic layout, and regulatory treatment of noncommercial educational licensees. Without such an exemption, the simulcasting mandate will preclude many public television stations from pursuing a transition to ATSC 3.0 (disproportionately impacting noncommercial stations and rural communities) and delivering the many public service benefits to viewers, such as interactive curriculum-driven children’s content, advanced public safety measures, and robust accessibility features.

Regards,

/s/ Lonna Thompson

Lonna Thompson
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and General Counsel
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